

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIMOTHY DEFOGGI,

Defendant.

8:13CR105

MOTION TO EXTEND THE TIME TO
FILE GOVERNMENT'S RESPONSE TO
DEFENDANT'S MOTIONS

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully requests that the Court extend the time to file the government's response to defendant's motions to November 26, 2013. In support of this request the United States offers the following:

1. The United States needs additional time to draft the responses to the multiple motions filed by the Defendant. The United States is currently responding to multiple motions filed in other related cases.
2. Sara Chang, DOJ Trial Attorney also assigned to this matter will be out of the country from November 11, 2013, through November 16, 2013.
3. Keith Becker, DOJ Trial Attorney also assigned to this matter need additional time due to responses due in other matters outside the District of Nebraska. Mr. Becker has recently been called away from the office on a family emergency.

WHEREFORE, the United States respectfully requests that the time to file the government's response to defendant's motion be extended to November 26, 2013.

UNITED STATES OF AMERICA

DEBORAH R. GILG
United States Attorney
District of Nebraska

By: *s/Michael P. Norris*
MICHAEL P. NORRIS (#17765)
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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: James Martin Davis, Attorney at Law.

s/Michael P. Norris
MICHAEL P. NORRIS
Assistant United States Attorney